

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

Ashley T. Adams,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No. 05-249-KAJ
Cheryl Denny	:	
Employee of JPMorgan Chase Bank	:	
and	:	
Dawn Harper Smith	:	
Employee of Integrity Staffing	:	
Defendants.	:	

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DISTRICT OF DELAWARE

Amended Complaint to Assert Claim under 42 U.S.C. SS 1981

1.

During the period of May 2003 and November 2003 experienced continual harassment from co-workers.

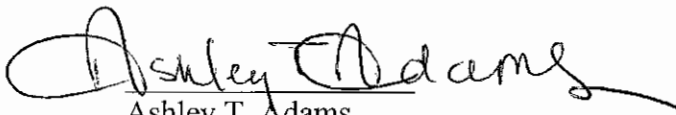
2.

Harper-Smith was notified on numerous occasions about the harassing conduct which initially started in a department where Cheryl Denny was a direct supervisor over Adams. Harper-Smith refused provide a suitable working environment for Adams and Adams subsequently walked out when the environment was so threatening that Adams felt immediate physical harm was to result to Adams by employees supervised by Cheryl Denny, and Denny herself.

3.

Harper-Smith did offer Adams another position in another department and Adams accepted. Adams was harassed continually. In the entire department that included twenty employees, Adams was the only white female. Adams was subjected to racial slurs, physical threats, and made less pay to other (male) workers, while Adams was required to be in a position of Team Leading and training the other employees. Adams was required to work mandatory overtime and every weekend, while others where not required to work the same hours. Adams reported the harassment to Harper-Smith, who refused to remedy the situation. Adams subsequently was terminated for retaliation for drafting a complaint and sending the complaint to management. Adams complaint was attempting to resolve the ongoing issues occurring in the department.

WHEREFORE, Plaintiff asks this honorable Court to allow amendment of Complaint to assert claim Claim under 42 U.S.C. SS 1981 and to allow relief as decided by the Court.


Ashley T. Adams

March 09, 2006

Certificate of Service

I hereby certify that I have
this day March 10, 2005, served
the foregoing Defendant, Pepper
Hamilton LLP 1313 Market Street
Wilmington DE 19899-1709
Amended Complaint to Assert
Claim under 42 U.S.C. § 1981.

Ashley T. Adams
March 10, 2005